

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

CATRISHA MICKLE,  
INDIVIDUALLY AND ON BEHALF OF  
ALL THOSE SIMILARLY SITUATED,

Plaintiff,

v.

SAGORA SENIOR LIVING, INC.,

Defendant.

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CIVIL ACTION NO: 1:19-cv-00044-MAC

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**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER  
OR OTHERWISE RESPOND TO PLAINTIFF’S ORIGINAL COMPLAINT**

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TO THE HONORABLE JUDGE OF THE COURT:

Pursuant to Fed. R. Civ. P. 6(b), Defendant, SAGORA SENIOR LIVING, INC., hereby moves for an Extension of Time to Answer or Otherwise Respond to Plaintiff’s Original Collective/Class Action Complaint and in support thereof would respectfully show as follows:

1. Plaintiff filed its Original Collective/Class Action Complaint on January 28, 2019. A summons was requested and issued, and Defendant was subsequently served on or about January 31, 2019. Therefore, the deadline for Defendant to answer or otherwise respond to the Complaint appears to be February 21, 2019.

2. Good cause exists for the granting of this motion. Defendant’s chief human resources officer resigned shortly after Defendant was served which caused delays in the choice of attorneys to represent Defendant. Additionally, at or about this time, Defendant’s counsel moved into new offices and the moving process delayed the firm’s ability to meet and consult

with persons filling the role as interim HR director. Consequently, Defendant requires additional time to properly respond to the Complaint.

3. On February 20, 2019, Greg Gober, counsel for Defendant spoke with Austin Anderson, counsel for the Plaintiff and Mr. Anderson indicated that his client did not oppose a three-week extension of the Defendant's deadline to respond to the Original Complaint. Mr. Anderson and Mr. Gober subsequently confirmed this agreement in writing through an exchange of e-mails.

WHEREFORE, PREMISES CONSIDERED, Defendant, SAGORA SENIOR LIVING, INC., respectfully requests that the Court grant this Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Collective Action Complaint and issue an order extending Defendant's time to answer or other respond to the Complaint for twenty-one days until March 14, 2019.

Respectfully submitted,

By: /s/ Greg Gober

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ATTORNEYS FOR SAGORA  
SENIOR LIVING, INC.

**CERTIFICATE OF CONFERENCE**

I hereby certify that on February 20, 2019, I conferred with Austin Anderson counsel for Plaintiff and Mr. Miltenberger stated that he is unopposed to the three-week extension sought in this motion.

/s/ Greg S. Gober

Greg S. Gober

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing Motion was made on February 21, 2019, by way of the Court's ECF system on all counsel of record.

/s/ Greg S. Gober

Greg S. Gober